

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

In re TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

Case No. 1:03-md-01570-GBD-SN

This document relates to:

The Underwriting Members of Lloyd's Syndicate 2, et al. v. Al Rajhi Bank, et al., No. 16-cv-7853; Aguilar, et al. v. Kingdom of Saudi Arabia, et al., No. 16-cv-09663; Addesso, et al. v. Kingdom of Saudi Arabia, et al., No. 16-cv-09937; Hodges, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-00117; Aiken, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-00450; Charter Oak Fire Insurance Co., et al. v. Al Rajhi Bank, et al., No. 17-cv-02651; Abarca, et al., v. Kingdom of Saudi Arabia, et al., No. 17-cv-03887; Arrowood Indemnity Co., et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-03908; Abedhajajreh v. Kingdom of Saudi Arabia, et al., No. 17-cv-06123; Fraser, et al. v. Al Qaeda Islamic Army, et al., No. 17-cv-07317; Muenchener Rueckversicherungs-Gesellschaft Aktiengesellschaft in Muenchen, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-07914; and Abbate, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-08617.

**DECLARATION OF MATTHEW S. LEDDICOTTE
IN SUPPORT OF AL RAJHI BANK'S REPLY MEMORANDUM IN SUPPORT
OF ITS OBJECTIONS TO THE MAGISTRATE JUDGE'S OPINION AND ORDER**

I, Matthew S. Leddicotte, declare as follows:

1. I am an active member in good standing of the bar of the District of Columbia, am Counsel in the law firm of White & Case LLP, and am admitted *pro hac vice* as counsel for Defendant Al Rajhi Bank before this Court in the above-captioned matter. I have personal knowledge of the facts set forth herein and, if called upon, could and would competently testify thereto under oath.

2. I submit this declaration in connection with Al Rajhi Bank's Reply Memorandum in Support of Its Objections to the Magistrate Judge's Opinion and Order.

3. Attached as Exhibit 1 is a true and correct copy of Plaintiffs' First Set of Consolidated Jurisdictional Requests for Production of Documents Directed to Al Rajhi Bank, including an accompanying cover letter, received from Plaintiffs' counsel by counsel for Al Rajhi Bank on May 11, 2021.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 14th day of May, 2021, in Washington, D.C.

/s/ Matthew S. Leddicotte

Matthew S. Leddicotte